

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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PROJECT LION LLC, d/b/a CRUSH d/b/a GREEK SNEEK, PROJECT M LLC d/b/a LA COMIDA, and PROJECT W LLC, d/b/a LA CAVE, Individually and on Behalf of All Others Similarly Situated,

Case No.: 2:20-cv-00768 (JAD) (VCF)

Plaintiffs,

-against-

BADGER MUTUAL INSURANCE COMPANY,

Defendant.

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**STIPULATION TO EXTEND DEFENDANT'S TIME
TO RESPOND TO AMENDED COMPLAINT
(Second Request)**

WHEREAS on April 28, 2020, Plaintiffs PROJECT LION LLC d/b/a CRUSH d/b/a GREEK SNEEK, PROJECT M LLC d/b/a LA COMIDA, and PROJECT W LLC, d/b/a LA CAVE (collectively, “Plaintiffs”) filed the Complaint in this action; and

WHEREAS on or about May 11, 2020, Plaintiffs submitted a claim to Defendant (the “Claim”); and

WHEREAS on May 26, 2020, Defendant BADGER MUTUAL INSURANCE COMPANY (“Defendant”) moved pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for dismissal of the Complaint; and

WHEREAS on June 16, 2020, Plaintiffs filed the Amended Complaint in this action alleging that they had submitted the Claim; and

WHEREAS on June 25, 2020, Defendant withdrew its motion to dismiss the Complaint; and

WHEREAS on June 30, 2020, Plaintiffs and Defendant, subject to a full reservation of rights by each, stipulated (the “First Stipulation”) to extend Defendant’s time to answer, move against, and/or otherwise respond to the Amended Complaint until August 14, 2020 so that Defendant can evaluate Plaintiffs’ Claim; and

WHEREAS on July 1, 2020, the Court so-ordered the First Stipulation; and

WHEREAS Defendant continues to evaluate Plaintiffs’ Claim; and

WHEREAS the parties have agreed, with a full reservation of rights by each, to further extend Defendant’s time to answer, move against, and/or otherwise respond to the Amended Complaint so that Defendant can evaluate Plaintiffs’ Claim; and

WHEREAS this is the second stipulation for an extension of Defendant’s time to answer, move against, and/or otherwise respond to the Amended Complaint;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel that the time for Defendant to answer, move against, and/or otherwise respond to the Amended Complaint in this action is extended to and hereby is September 14, 2020.

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be signed in counterparts, and faxed or electronic signatures on this Stipulation shall be deemed original signatures.

Dated: August 10, 2020

*Counsel for Plaintiffs Project Lion LLC d/b/a
Crush d/b/a Greek Sneek, Project M LLC
d/b/a La Comida, and Project W LLC, d/b/a
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SO ORDERED:



Cam Ferenbach
United States Magistrate Judge

Dated this 10th day of August, 2020.